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*(Additional counsel appear on signature page)*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch,  
Brandon Vera, Luis Javier Vazquez, and Kyle  
Kingsbury, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO  
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-  
2 5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the "Protective Order")  
3 issued in this action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry,  
4 Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all  
5 others similarly situated (collectively, "Plaintiffs") hereby move this Court for leave to lodge under  
6 seal Plaintiffs' Reply Statement Regarding Rule 23 Standards and Plaintiffs' Response to Zuffa,  
7 LLC's Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on  
8 Class Certification (ECF No. 632).

9 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly  
10 Confidential – Attorneys' Eyes Only "shall be provisionally lodged under seal with the Court, and  
11 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the  
12 Court, the Party claiming protection shall file a motion to seal setting forth the bases for sealing  
13 and proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006),  
14 or some other applicable authority." ECF No. 217 at 15.

15 Portions of Plaintiffs' Reply Statement Regarding Rule 23 Standards and Plaintiffs'  
16 Response to Zuffa, LLC's Proposal Regarding the Treatment of Protected Material for the  
17 Evidentiary Hearing on Class Certification (ECF No. 632) refer to materials which have been  
18 designated Confidential or Highly Confidential – Attorneys' Eyes Only by Defendant. Accordingly,  
19 Plaintiffs seek leave to lodge under seal Plaintiffs' Reply Statement Regarding Rule 23 Standards  
20 and Plaintiffs' Response to Zuffa, LLC's Proposal Regarding the Treatment of Protected Material  
21 for the Evidentiary Hearing on Class Certification (ECF No. 632). Plaintiffs have filed these  
22 documents under seal, in accordance with the Court's ECF system, with the instant motion.  
23 Plaintiffs have publicly filed redacted versions of these documents with the Court, and will serve  
24 un-redacted versions of these documents on Defendant, in accordance with LR IC 4-1(c)(4).

25 Plaintiffs do not believe that Zuffa's confidentiality designations subject to this motion  
26 meet the compelling reasons standard. However, solely for the limited reason that the materials  
27 referenced, as they currently stand, are still designated Confidential or Highly Confidential,  
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1 Plaintiffs seek to file the documents in question under seal, in accordance with the Protective  
2 Order. Plaintiffs continue to reserve their right to challenge Zuffa's confidentiality designations  
3 pursuant to Section 6.1 of the Protective Order.  
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1 Dated: January 23, 2019

Respectfully Submitted,

2 By: /s/ Eric L. Cramer  
3 Eric L. Cramer

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of January, 2019 a true and correct copy of **PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL** and supporting papers was served via the Court's CM/ECF system on all parties or persons requiring notice.

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*/s/ Eric L. Cramer*  
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